



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 12, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Citizens Telephone Company (MO)
Study Area Code 421865**

Dear Ms. Dortch:

On behalf of Citizens Telephone Company (MO) (“Citizens”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Citizens seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 12, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Citizens Telephone Company (MO)
Study Area Code 421865
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Citizens Telephone Company (MO) (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

<010> Study Area Code	421865
<015> Study Area Name	CITIZENS TEL CO - MO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Kathie Munson
<035> Contact Telephone Number: Number of the person identified in data line <030>	6605846527 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	kmunson@ctcis.net

ANNUAL REPORTING FOR ALL CARRIERS	54.313	54.422
	Completion Required	Completion Required

			<i>(check box when complete)</i>	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <input type="text" value="421865MO510.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <input type="text" value="421865MO610.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	<input type="text" value="Yes"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

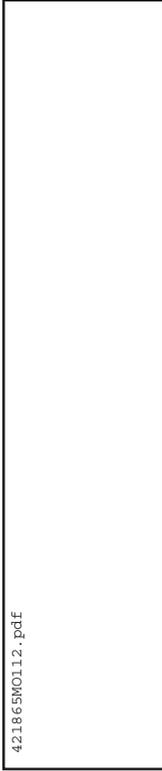
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 421865
 <015> Study Area Name CITIZENS TEL CO - MO
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Kathie Munson
 <035> Contact Telephone Number - Number of person identified in data line <030> 6605846527 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> kmunson@ctcis.net

<110> Has your company received its ETC certification from the FCC? (yes / no)
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "5
 <111> year plan" filed with the FCC? (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	Yes
<114> Report how much universal service (USF) support was received	Yes
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	Yes

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 421865
 <015> Study Area Name CITIZENS TEL CO - MO
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Kathie Munson
 <035> Contact Telephone Number - Number of person identified in data line <030> 6605846527 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> kmunson@ctcis.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No or Not Applicable

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Kathie Munson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605846527 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kmunson@ctcis.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Kathie Munson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605846527 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kmunson@ctcis.net

421865MO1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP portal.ctcis.net/telephone/lifelineservice

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:



<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010> Study Area Code 421865
 <015> Study Area Name CITIZENS TEL CO - MO
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Kathie Munson
 <035> Contact Telephone Number - Number of person identified in data line <030> 605546527 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> kmunson@ctcis.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Name of Attached Document(s) Listing Required Information

- <2021> Interim Progress Community Anchor Institutions

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FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

<010> Study Area Code 421865

<015> Study Area Name CITIZENS TEL CO - MO

<020> Program Year 2016

<030> Contact Name - Person USAC should contact regarding this data Kathie Munson

<035> Contact Telephone Number - Number of person identified in data line <030> 6605846527 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> kmunson@ctcis.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(ii))

421865MO3010.pdf

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

421865MO3012.pdf

Name of Attached Document Listing Required Information

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

Name of Attached Document Listing Required Information (Yes/No)

(Yes/No)

(3014) If yes, does your company file the RUS annual report

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information (Yes/No)

(3018) If the response is no on line 3014, is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

421865MO3026.pdf

Name of Attached Document Listing Required Information

(3026) Attach the worksheet listing required information

Data Collection Form

<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Kathie Munson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605846527 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kmunson@ctcis.net

Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Kathie Munson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605846527 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kmunson@ctcis.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421865
<015>	Study Area Name	CITIZENS TEL CO - MO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Kathie Munson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6605846527 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	kmunson@ctcis.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent:	JSI
Name of Reporting Carrier:	CITIZENS TEL CO - MO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/12/2015
Printed name of Authorized Officer:	Brian Cornelius
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	6605842111 ext.
Study Area Code of Reporting Carrier:	421865 Filing Due Date for this form: 07/01/2015
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	CITIZENS TEL CO - MO
Name of Authorized Agent or Employee of Agent:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/12/2015
Printed name of Authorized Agent or Employee of Agent:	Tanea Davis Foglia
Title or position of Authorized Agent or Employee of Agent:	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	421865 Filing Due Date for this form: 07/01/2015
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

Attachments

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report For**

ATTACHMENT REDACTED IN ENTIRETY

Citizens Telephone Company’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis. In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”³

Citizens Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with service quality and consumer protection provisions under state law. These provisions include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Missouri Public Service Commission which discloses rates, terms and conditions of service to customers; (2) compliance with state consumer protection provisions relating to Customer Services as identified in section 4 CSR 240-32.050 of the Missouri Code of State Regulations, compliance with provisions for Quality of Service as identified in section 4 CSR 240-32.070 of the Missouri Code of State Regulations, compliance with Service Objectives as identified in section 4 CSR 240-32.080 of the Missouri Code of State Regulations, compliance with customer Inquiry

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

procedure as identified in 4 CSR 240-33.060 of the Missouri Code of State Regulations, compliance with Dispute standards as identified in 4 CSR 240-33.080 of the Missouri Code of State Regulations; (3) compliance with truth-in-billing requirements; and (4) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Citizens Telephone Company Ability to Function in Emergency Situations for voice and broadband services:

Citizens Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Missouri Code of State Regulations. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require. In addition, the Company has redundancy for connectivity purposes via additional routes and electronic equipment for both voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery reserve that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites and has a maintenance program in place as described in section 4 CSR 240-32.060 of the Missouri Code of State Regulations.

The company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

Citizens Telephone Company
of Higginsville, Missouri, Inc.

1st Revised Sheet No. 3-1
Cancels Original Sheet No. 3-1

GENERAL RULES AND REGULATIONS RECEIVED

3. General Rules and Regulations

JUL 30 1998

3.1 Application

MO. PUBLIC SERVICE COMM

The rules and regulations specified herein apply to the intrastate services and facilities of Citizens Telephone Company of Higginsville, Missouri, Incorporated, hereinafter referred to as the Company. Failure on the part of the subscribers to observe these rules and regulations of the Company, after due notice of such failure, automatically gives the Company the authority to discontinue the furnishing of service.

In the event of a conflict between any rate, rule, regulation or provision contained in these General Rules and Regulations and any rate, rule, regulation or provision contained in the specific tariffs, the rate, rule, regulations or provision contained in the specific tariffs shall prevail.

This tariff cancels and supersedes all other local tariffs of the Company issued and effective prior to the effective date of this tariff.

The Company, which acts as the Secondary Carrier (SC) under the Missouri Primary Carrier by Toll Center Plan filed with the Missouri Public Service Commission, subtends the Southwestern Bell Telephone toll and WATS complexes. Rates for these services are contained in the Toll and WATS tariffs of Southwestern Bell Telephone Company.

3.2 Explanation of Symbols

- (C) Signifies a changed regulation.
- (D) Signifies a discontinued rate, treatment or regulation.
- (I) Signifies an increased rate or new treatment resulting in an increased rate.
- (M) Signifies move of regulation or rate to or from specified sheets. (N)
- (N) Signifies a new rate, treatment or regulation.
- (R) Signifies a reduced rate or new treatment resulting in a reduced rate.
- (T) Signifies a change in text but no change in rate, treatment or regulation.

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**MISSOURI
Public Service Commission**

Effective: September 1, 1998

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Citizens Telephone Company
of Higginsville, Missouri, inc.

Original Sheet No. 3-2

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.3 Obligation and Liability of Company

A. Availability of Facilities

The Company's obligation to furnish telephone service is dependent upon its ability to secure suitable facilities and to provide such service without unreasonable expense.

B. Interruption of Service

An allowance will be made upon notice and demand to the Company for interruption of service not due to subscriber negligence if the interruption continues for more than thirty six hours from the time it is reported to or detected by the Company. The allowance will be the prorated portion of the monthly rate for the service made inoperative.

C. Directory Errors and Omissions

The Company endeavors to correctly list customers, their telephone numbers and other information in the local telephone directory. No liability for damages arising from errors in or omissions of directory listings or listings obtained from Directory Assistance shall attach to the Company. In the case of additional or extra listings for which a charge is made, the Company's liability shall be limited to the monthly rate for each such listing for the charge period during which the error or omission continues.

D. Transmitting Messages

The Company does not undertake to transmit messages, but rather offers the use of its facilities, where available, for communication between parties subject to the conditions specified in these tariffs.

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Citizens Telephone Company
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Original Sheet No. 3-3

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.3 Obligation and Liability of Company (Cont'd)

E. Defacement of Premises

The Company will make a reasonable effort to leave the customer's property in the same condition as it was found in prior to any Company work. The Company will repair or replace any defacement or damage of property due to installation, existence, or removal of Company property when the damage is the result of negligence of the Company.

F. Maintenance and Repairs

The Company shall bear the expense of all repair and maintenance of its facilities, except where damage or destruction of its facilities are due to the acts or omissions of the subscriber. The subscriber may not rearrange, remove, or disconnect any Company facilities without consent of the Company.

G. Adjustment of Charges

In case of overbilling, a refund will be made by the Company for the amount of excess charges or for an estimate of the overbilling amount. The maximum refund will not exceed the actual or estimated overbilling over a three year period.

In case of underbilling, the company reserves the right to backbill for the deficiency charges up to a period of three years.

H. Liability of Company

1. The liability of the Company for damages arising out of mistakes, omissions, interruptions, delays or errors or defects in transmission occurring in the course of furnishing service and not caused by negligence of the customer shall in no event exceed an amount equivalent to the proportionate charge to the customer for the period of service during which such mistakes, omissions, interruptions, delays or errors or defects in transmission occur in excess of 36 hours after notification has been made.

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GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

SEP 24 1993

3.3 Obligation and Liability of Company (Cont'd)

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H. Liability of Company (Cont'd)

2. The customer indemnifies and saves the Company harmless against the following:

- (a) Acts or omissions of other companies when their facilities are used in connection with the Company's facilities to provide service.
- (b) Any defacement or damage to the customer's premises, resulting from the existence of the Company's facilities (demarcation point and drop) on such premises, or from the installation or removal thereof, when such defacement or damage is not the result of the negligence of the Company or its employees.
- (c) Any accident, injury or death occasioned by its equipment or facilities when such is not due to negligence of the Company.
- (d) Claims for libel, slander or infringement of copyright arising from the material transmitted or recorded over its facilities; claims for infringement of patents arising from combining with, or using in connection with, facilities of the Company, apparatus and systems of the customer; and all other claims arising out of any act or omission of the customer in connection with facilities provided by the Company.
- (e) Liability for failure to provide service.
- (f) Liability for telephone directories except as outlined in Section 3.3.C.

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GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

SEP 24 1993

3.4 Use of Service and Facilities

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A. Provision of Equipment

1. All equipment necessary for the provision of a given service will be furnished and owned by the Company except as provided elsewhere in this Tariff. The customer may be required to provide suitable housing or other protective measures where equipment is to be installed in locations exposed to weather or other hazards. Commercial power will be furnished by the customer at a suitable outlet when and where required.
2. As mandated in F.C.C. Docket 79-105 and the Missouri Public Service Commission Case No. TO-85-267, the Company will not install or maintain Inside Wire on a regulated basis after January 1, 1987, except for Company Owned Public Access Coin Sets.
3. Equipment not owned by the Company may be attached to the facilities of the Company as provided in Section 3.4.B. In case unauthorized attachment or connection is made, the Company shall have the right to discontinue the service.
4. The provisions of the preceding shall not be construed or applied to bar a customer from using devices which serve his convenience in his use of the facilities of the Company (such as a device to obtain quietness or privacy), provided any such device so used does not:
 - a. Endanger the safety of Company employees or the public.
 - b. Damage, require change in or alteration of, or involve direct electrical connection to the equipment or other facilities of the Company, unless as provided for elsewhere in this Tariff.
 - c. Interfere with the proper functioning of such equipment or facilities.
 - d. Impair the operation of the communication system.
 - e. Otherwise injure the public in its use of the Company's services.

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1st Revised Sheet No. 3-6
Cancels Original Sheet No. 3-6

GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

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3.4 Use of Service and Facilities (Cont'd)

MO. PUBLIC SERVICE COMM

B. Customer Provided Equipment and Inside Wire

- 1. Customer-provided equipment and/or inside wire may be connected at the customer's premises to facilities of the Company for use with local exchange service in compliance with FCC regulations.
- 2. Customers may connect equipment, systems and/or inside wire registered or grandfathered by the FCC directly to the Company network.
- 3. The General Regulations contained in Section 3 of this Tariff apply when the customer elects to provide his own equipment and/or inside wire. In any instance where the Tariff of the Company conflicts with an effective order of the FCC, the FCC order will have precedence.

4. Responsibility of the Customer

- a. A customer desiring to connect customer-provided equipment to the exchange and message toll network shall, upon request, notify the Telephone Company of each line to which registered equipment is connected and shall, upon request, notify the Telephone Company when such registered equipment is permanently disconnected.
- b. The customer shall provide the Telephone Company, upon request, the Registration Number and Ringer Equivalence Number for the registered equipment for the required Telephone Company-provided standard jack. The customer shall also provide, when appropriate, the off-premises station port signaling capability of a PBX system.

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Effective: September 1, 1998

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Citizens Telephone Company
of Higginsville, Missouri, inc.

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.4 Use of Service and Facilities (Cont'd)

B. Customer Provided Equipment and Inside Wire (Cont'd)

4. Responsibility of the Customer (Cont'd)

b. Upon notification from the Company that the customer-provided equipment or inside wire is causing or is likely to cause harm, the customer shall make such change as is necessary to remove such harm. Failure to make such change will result in disconnection of service until such change is completed to the satisfaction of the Company.

c. The customer may be required, as a condition of service, to pay in full all sums due the Company including, but not limited to, customer activity charges, termination charges, minimum charges, and reimbursement for loss or damage to Company facilities as may apply.

d. A customer must subscribe to, and be capable of providing operation for, sufficient quantities of local exchange service lines to provide adequate access to his customer-provided equipment and/or inside wire in accordance with accepted communications industry standards.

e. The customer must provide all of the terminal equipment and/or inside wire on the customer's side of the point of demarcation between Company owned equipment and customer-owned equipment.

f. Use of Company facilities or service in connection with any device for recorded public announcements is subject to the following conditions:

(1) For purposes of identification, customers to telephone service who transmit recorded public announcements over facilities provided by the Company must include in the recorded message the name of the organization or individual responsible for the service and the address at which the service is provided.

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GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

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3.4 Use of Service and Facilities (Cont'd)

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B. Customer Provided Equipment and Inside Wire (Cont'd)

4. Responsibility of the Customer (Cont'd)

f. (Cont'd)

(2) Customers transmitting factual public announcements such as time, stock market quotations, airline schedules and similar information are excluded from the preceding condition.

(3) Nonpublished telephone service will not be furnished for use with recorded public announcements.

(4) Failure to comply with the provisions of this Tariff shall be cause for termination of the service.

g. Customer-provided systems, equipment, and inside wire must comply with the requirements of Part 68 of the Rules of the Federal Communications Commission.

5. Responsibility of the Company

a. The Company shall not be responsible to the customer for changes in the technical criteria or in any of the facilities, operations or procedures initiated by the Company or appropriate regulatory agencies which might render any customer-provided equipment obsolete or require modification or alteration of such equipment or otherwise affect its use or performance. The Company will make a reasonable effort to notify a customer in advance of changes in technical criteria, operations or procedures which might affect customer-provided equipment or systems.

b. The Company shall not be responsible for the installation, operation or maintenance of any customer-provided communications systems, equipment, or inside wire.

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2nd Revised Sheet No. 3-9
Cancels 1st Revised Sheet No. 3-9

GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

JUL 30 1998

3.4 Use of Service and Facilities (Cont'd)

MO. PUBLIC SERVICE COMM

C. Use of Subscriber Service

1. Local exchange telephone service, as distinguished from payphone service, is furnished only for the use by the subscriber, his/her family, and associates. The Company may refuse to install or permit such service to remain on premises of payphone character. (T)
2. Telephone Service cannot be obtained by the use of extension service. (N)

D. Abuse or Fraudulent Use of Service

Local exchange service is furnished subject to the condition that there will be no abuse or fraudulent use of the service. The Company may disconnect service which is used in such a manner as listed below. In case of such disconnection, the Company will immediately attempt to notify the customer.

Abuse or fraudulent use of service includes the following:

1. The use of service used in such a manner as to interfere with the service of other telephone users.
2. The use of service for any purpose other than as a means of communication.
3. Tampering with company equipment for the purpose of obtaining service without payment of charges applicable to the service rendered by the Company or common carriers using the Company's facilities.
4. The use of profane or obscene language.
5. The impersonation of another individual with fraudulent or malicious intent.
6. The use of service which is objected to by or on behalf of any governmental authority on the grounds that such service is or is to be used for illegal purposes.

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.5 Establishment and Furnishing of Service

A. Application for Service

Application for service must be made on the Company's standard form, which becomes a contract when accepted in writing by the Company or upon establishment of service. The subscriber may be required to pay in advance all charges including applicable Customer Activity Charges for the first billing period. The conditions of such contracts are subject to all provisions of this and other applicable tariffs. Requests for additional service may be made verbally, if provided in the original contract, and no advance payment will be required. A move within the exchange area is not considered to terminate the contract and orders for such may be made verbally. Any change in rates, rules or regulations shall act as a modification of the contract to that extent, without further notice.

B. Telephone Numbers

The Company may change any or all numbers or the central office associated with such number whenever it deems it necessary in prudently conducting its business. Should it become necessary to make such a change, the Company will provide reasonable notice of the effective date and reason for the change. A subscriber may request a telephone number change and if feasible the change will be made at the rate following in Section 5.4.B.

C. Alterations

The subscriber agrees to notify the Company of any alterations which will necessitate changes in the Company's wiring; and the subscriber agrees to pay the Company's current charges for such changes.

D. Payment of Service

The subscriber is required to pay all charges for services rendered by the Company, both exchange and toll, in accordance with provisions contained in this tariff. The subscriber is responsible for all charges for service rendered at his telephone, including collect charges.

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.5 Establishment and Furnishing of Service (Cont'd)

E. Line Extensions

Lines will be extended for permanent customers in accordance with the guidelines established in Section 6.9.

Where required by the conditions, applicants may be required to provide to the Company suitable private right-of-way parallel to the public highway.

F. Unusual Installation Costs

When special conditions or special requirements of the subscriber involve unusual construction or installation costs, the subscriber may be required to pay such costs pursuant to Section 7.

3.6 Telephone Directories

The Company will prepare and furnish to each subscriber an alphabetically arranged list of the names of all subscribers of the Local Exchange. Extra name listings of subscribers will be furnished when desired by any subscriber or listings will be handled on a nonpublished basis or nonlisted basis (see Section 6-7 following) if requested. Such alphabetically arranged lists shall constitute the Company's telephone directory. The directory is the property of the Company, furnished for the purpose of expediting service, and may be taken up by the Company at the termination of the contract for service or when new directories are issued.

The Company will furnish to its subscribers, without charge, only such directories as it deems necessary for the efficient use of the service. Other directories will be furnished at the discretion of the Company at a reasonable charge.

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SEP 27 2000

CITIZENS TELEPHONE COMPANY
OF HIGGINSVILLE, MISSOURI, INC.

MISSOURI
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P.S.C. MO. NO. 4
1st Revised Sheet No. 3-12
Cancels Original Sheet No. 3-12

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.7 Establishment and Maintenance of Credit

A. Establishment of Credit for Service

The Company may require an application for new service to post a deposit if:

(C)

1. The applicant is unable to establish that he had a previous service account with a telephone utility for a period of at least twelve (12) months for which all undisputed charges were satisfactorily paid or

The applicant has not previously had telephone service for a twelve (12) month period and does not meet at least two of the following criteria:

- Has a valid major national charge card
- Has a valid major national oil charge card
- Has a local charge card
- Home ownership
- Has been employed two years or more with the current employer
- Has a savings account
- Has an existing loan from a financial institution not considered delinquent by the creditor

2. The Company is not obligated to furnish service to any individual that owes for service furnished by the Company previously rendered at the same or a different address until arrangements have been made for payment in full of such previous indebtedness to the Company.

3. The Company may require a deposit or guarantee as a condition of continued service if undisputed charges in two out of the last twelve (12) billing periods become delinquent. The deposit shall not exceed charges for two (2) months service based on the average bill during the preceding twelve (12) months.

(D)

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SEP 27 2000

CITIZENS TELEPHONE COMPANY
OF HIGGINSVILLE, MISSOURI, INC.

**MISSOURI
Public Service Commission**

P.S.C. MO. NO. 4
1st Revised Sheet No. 3-13
Cancels Original Sheet No. 3-13

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.7 Establishment and Maintenance of Credit (Cont'd)

A Establishment of Credit for Service (Cont'd)

- 5. In lieu of a deposit the Company may accept a written guarantee. The guarantee shall be limited to an amount not to exceed the cash deposit provided for in these tariffs.
- 6. No deposit or guarantee shall be required by the Company because of race, sex, creed, national origin, marital status, age, number of dependents, source of income, condition of physical handicap or geographical location or residence of the subscriber.
- 7. A deposit shall be subject to the following terms:

It shall not exceed estimated charges for two (2) months service based on the average bill during the preceding twelve (12) months or in case of a new applicant for service the average monthly bill for all subscribers within a customer class.

The deposit shall bear interest at a rate which is equal to one percent (1%) above the prime lending rate as published in the *Wall Street Journal*. This rate shall be adjusted annually on December 1 using the prime lending rate, as published in the *Wall Street Journal* on the last business day of September of each year, plus one percent (1%). The interest shall be credited annually upon the account of the customer or paid upon the return of the deposit, whichever occurs first. Interest shall not accrue on any deposit after the date on which a reasonable effort has been made to return it to the customer.

(C)
(C)

The deposit along with the accrued interest shall be promptly refunded or credited against charges stated on subsequent bills upon satisfactory payment of all undisputed charges during the last twelve (12) billing periods. The Company may withhold the refunding of a deposit, to the extent of a disputed amount, pending the resolution of a dispute with respect to charges secured by such deposit.

The deposit shall be credited with accrued interest to the charge stated on the final bill and the balance if any shall be returned to the subscriber within twenty-one (21) days after the rendition of a final bill upon the discontinuance or termination of service.

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.7 Establishment and Maintenance of Credit (Cont'd)

A. Establishment of Credit for Residence Service (Cont'd)

- 8. The Company shall permit a customer concurrent with the beginning of service, to post a deposit in two (2) equal monthly installments or as otherwise agreed upon by the subscriber and the Company.

A guarantor shall be released upon satisfactory payment of all undisputed charges during the last twelve (12) billing periods. Payment of a charge is satisfactory if received prior to the date upon which the charges become delinquent. A guarantor may also be released from the guarantee commitment by giving the Telephone Company thirty days written notice of termination of the guarantee.

9. Deposit not to Affect Regular Collection Practices

The fact that a deposit has been made shall in no way relieve the applicant or subscriber from complying with the Company's regulations as to advance payments and the prompt payments of bills on presentation; nor constitute a waiver or modification of the regular practices of the Company providing for the discontinuance of the service for non-payment of any sums due the Company for service rendered. The Company may discontinue service to any subscriber failing to pay current bills without regard to the fact that such subscriber has made a deposit with the Company to secure a payment of such bills or has furnished the Company with a guarantee in writing of such bills.

10. Records

The Company maintains a record of previous accounts by name, address and telephone number.

The Company shall maintain records which show the name of each customer who has posted a deposit, the current address of such customers, the date and amount of the deposit, the date and amount of interest paid, and the earliest possible refund date.

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.7 Establishment and Maintenance of Credit (Cont'd)

A. Establishment of Credit for Residence Service (Cont'd)

10. Records (Cont'd)

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Each customer posting a deposit shall receive in writing at the time of posting or within ten days from that date, a receipt which contains the following information:

- (a) Name of customer.
- (b) Address where the service for which the deposit is required will be provided.
- (c) Place where deposit was received or a designated code which identifies the location.
- (d) Date when the deposit was received.
- (e) Amount of deposit
- (f) The terms which govern retention and refund of the deposit.

The Company shall show on the customer's bill whether or not the customer has a deposit with the Company and thereby provide means whereby a person entitled to a refund of a deposit is not deprived of the refund even though he may be unable to produce the receipt for the deposit, provided he can produce identification to ensure that he is the person entitled to the refund. The Company shall maintain a record of the deposit refunded and interest paid on such deposit for a period of at least two years after the refund is made.

11. Service Reconnection Charges

Where service has been discontinued for failure to establish credit as authorized above, a service reconnection charge found in Section 5.2.E will apply.

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Public Service Commission

Citizens Telephone Company
of Higginsville, Missouri

P.S.C. MO. NO. 4
1st Revised Sheet No. 3-16
Cancels Original Sheet No. 3-16

GENERAL RULES AND REGULATIONS

Missouri Public

3. General Rules and Regulations (Cont'd)

REC'D MAR 14 2002

3.7 Establishment and Maintenance of Credit (Cont'd)

B. Deposits and Guarantees of Payment - Business Service

Service Commission

- 1. If it is deemed necessary by the Company to safeguard its interests, applicants for service or present customers may be required to make a deposit of an amount not to exceed the sum of two (2) months' monthly recurring charges for services subscribed to plus two (2) months' estimated long distance charges. If the customer's service is terminated for any reason the deposit will be applied to reduce the amount of any unpaid charges for exchange or long distance service.

The deposit shall bear interest at a rate which is equal to one percent (1%) above the prime lending rate as published in the *Wall Street Journal*. This rate shall be adjusted annually on December 1 using the prime lending rate, as published in the *Wall Street Journal* on the last business day of September of each year, plus one percent (1%). The interest shall be credited annually upon the account of the customer or paid upon the return of the deposit after the date on which a reasonable effort has been made to return it to the customer.

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- 2. An applicant for service, or present customer, may satisfy a deposit requirement by providing a Contract of Guaranty in an amount not more than the requested deposit from a present customer acceptable to the Company. The guaranty contract shall be on a form provided by the Company which shall include the Company's right to transfer charges to the limit of the guaranty, from a defaulted bill of the customer, from whom a deposit or a Contract of Guaranty was required, to the guarantor's account or accounts and the further right to suspend guarantor's service.
- 3. The fact that a deposit has been made, or a guaranty provided, shall in no way relieve the customer from complying with the Company's regulations as to the prompt payment of bills, nor constitute a waiver or modification of the regular practices of the Company providing for the temporary suspension of service or the termination of the service contract for non-payment of bills.
- 4. Service may be discontinued for failure to furnish a suitable deposit as outlined in Section 3.9(D) hereafter.

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Citizens Telephone Co.
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GENERAL RULES AND REGULATIONS

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3. General Rules and Regulations (Cont'd)

NOV 19 1997

3.7 Establishment and Maintenance of Credit (Cont'd)

B. Deposits and Guarantees of Payment - Business Service (Cont'd)

MO. PUBLIC SERVICE COM.

5. Any balance of the amount deposited and credited to the customer's account is returned to the customer at the termination of the contract, or it may be returned at any time previous thereto at the option of the Company when it is deemed that the customer has established satisfactory credit.

A service deposit will not be required for lifeline service, if the qualifying low-income customer voluntarily elects toll blocking, where available. If toll blocking is unavailable a service deposit may be charged.

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3.8 Billing and Collection Standards

A. Billing Standards:

1. Bills for telephone service are issued monthly, and are due when rendered. Generally, monthly recurring charges are billed in advance. The Company shall render a bill during each billing period except when there is a zero balance.
2. The subscriber shall receive a bill during each billing period. Failure to receive a bill does not relieve the subscriber of the responsibility for payment for telephone service.
3. Billing cycles may be altered if the affected customers are sent an insert or other written notice explaining the alteration not less than thirty (30) days prior to the effective date of the alteration.

B. Collection Standards:

1. Residential subscribers shall have at least twenty-one (21) days from the rendition of the bill to pay the charges stated thereon. Payment shall be made at the office of the Company, an authorized collection agency, or by mail.

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CITIZENS TELEPHONE COMPANY
OF HIGGINSVILLE, MISSOURI, INC.

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Cancels Original Sheet No. 3-18

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.8 Billing and Collection Standards (Cont'd)

B. Collection Standards: (Cont'd)

- 2. Toll charges are due monthly and payable any time during the twenty-one (21) days following the presentation of the bill. Toll charges are subject to the rules and regulations of Section 3.8.B.3 as they may apply. This utility will conform to all rules and regulations of the Public Service Commission as they may apply.
- 3. A charge as determined by the company will be made for all checks returned to the company for insufficient funds. If two insufficient funds checks are received from a subscriber within a twelve (12) month period, the company may required that all subsequent payments be made by case, money order, or certified check.
- 4. Total bills remaining unpaid twenty-two (22) days after rendition shall be considered delinquent. (D)

C. Customer Bill Format

- 1. Every bill shall clearly state:
 - a. The number of access lines for which charges are stated;
 - b. The beginning or ending dates of the billing period for which charges are stated; (M)
 - c. A statement of the date the bill becomes delinquent if not paid; (M) & (D)
 - d. Penalty fees and advance payments, if any; (N)
 - e. The unpaid balance, if any; (N)
 - f. The amount due for basic service;

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MISSOURI
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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.8 Billing and Collection Standards (Cont'd)

C. Customer Bill Format (Cont'd)

- g. An itemization of the amount due for all other regulated or nonregulated services including the date and duration (in minutes or seconds) of each toll call if such service is provided as an individual service;
- h. the amount due for all other regulated or nonregulated services offered at a packaged rate and an itemization of each service included in the package;
- i. An itemization of the amount due for taxes, franchise fees and other fees and/or surcharges which the telecommunications company, pursuant to its tariffs, bills to customers;
- j. The total amount due;
- k. A toll free telephone number where inquiries and/or dispute resolutions may be made for each company with charges appearing on the customer's bill;
- l. The amount of any deposit, advance payments and/or interest accrued on a deposit which has been credited to the charges stated; and
- m. Any other credits and charges applied to the account during the current billing period.

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3.9 Minimum Contract Periods and Termination of Service

A. Minimum Contract Periods

Except as hereinafter provided, the minimum contract period for all services and facilities is one month at the same location.

The Company may require a minimum contract period longer than one month at the same location in connection with special (non-standard) types or arrangements of equipment, or for unusual construction necessary to meet special demands, and involving extra cost.

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

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3.9 Minimum Contract Periods and Termination of Service (Cont'd)

SEP 24 1993

A. Minimum Contract Periods (Cont'd)

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Public Service Commission

Service will not be installed for a period of less than one month unless the subscriber pays, in addition to one month's rental, the cost of installation and removal of the necessary facilities.

B. Termination of Service - Subscriber's Request

Service may be terminated prior to the expiration of the minimum contract period upon notice being given to the Company, and upon payment of any applicable termination charges, in addition to any applicable charges due for service which has been furnished.

In the case of service for which the minimum contract period is one month, termination will require that charges due for the balance of the minimum period be paid.

For special equipment, the charges will be based on the individual circumstances in each case as agreed upon at the time of installation.

Contracts for periods longer than one month covering services which installation required line extensions may be terminated upon payment of all charges that would accrue to the end of the contract period. Alternatively, the contract may be transferred to a new applicant who is to occupy the same premises and will subscribe to the service effective on the day following termination by the original subscriber upon agreement by the new applicant to assume the responsibilities of the contract.

Service may be terminated after the expiration of the initial contract period, upon the Company being notified, and upon payment of all charges due to the date of termination of the service.

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OF HIGGINSVILLE, MISSOURI, INC.

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.9 Minimum Contract Periods and Termination of Service

C. Termination of Service to Customers by the Company

1. Service to customers may be discontinued for any of the following reasons:

- a. Nonpayment of an undisputed delinquent charge for basic local telecommunications service.
- b. Failure to post a required deposit or guarantee.
- c. Unauthorized use of the Company's equipment in a manner which creates an unsafe condition or creates the possibility of damage or destruction to such equipment.
- d. Failure to substantially comply with the terms of a settlement agreement.
- e. Refusal after reasonable notice to permit inspection, maintenance, or replacement of Company's equipment.
- f. Material misrepresentation of identity in obtaining telephone utility service.
- g. As provided by state or federal law.

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D. Procedures for Discontinuance of Service

- 1. A written notice shall be sent by first class mail ten (10) days prior to discontinuance of service.
- 2. Service may be discontinued during normal business hours on or after the date specified in the notice of discontinuance. Basic local telecommunications, as defined by the Missouri Public Service Commission, shall not be discontinued on a day when the offices of the Company are not open to facilitate reconnection of service, or on a day immediately preceding such day. Service shall not be discontinued for a non-payment of a delinquent charge until ten (10) days after a charge has become delinquent.
- 3. At least twenty-four (24) hours preceding a discontinuance of service the Company shall make an effort to contact the subscriber and advise them of the discontinuance and what action must be taken to avoid it.
- 4. Discontinuance of service shall be postponed for a time not in excess of twenty-one (21) days if the telephone is necessary to obtain emergence medical assistance for a person who is a member of the household where the telephone service is provided and where such person is under the care of a physician. Any

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CITIZENS TELEPHONE COMPANY
OF HIGGINSVILLE, MISSOURI, INC.

**MISSOURI
Public Service Commission**

P.S.C. MO. NO. 4
1st Revised Sheet No. 3-22
Cancels Original Sheet No. 3-22

GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

3.9 Minimum Contract Periods and Termination of Service

person who alleges such emergency shall, if requested, provide the Company with reasonable evidence of such necessity.

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5. Basic local telecommunications service may not be discontinued for customer nonpayment of a delinquent charge for other than basic local telecommunications service. Company may place global toll blocking and eliminate any optional, non-basic calling features and functions for customer nonpayment of delinquent charges for other than basic local telecommunications service.

6. Payment by personal check may be refused if the customer, within the last twelve (12) months, has tendered payment in this manner and the check has been dishonored, except when the dishonor is due to bank error.

7. Upon the customer's request, the Company shall restore service consistent with all other provisions of this tariff when the cause of discontinuance has been eliminated.

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Citizens Telephone Company
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GENERAL RULES AND REGULATIONS Missouri Public Service Commission

REC'D DEC 14 1998

3. General Rules and Regulations (Cont'd)

3.10 Charges for Damages

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In situations where impairment or interruption of service is caused by tampering with Company wiring or equipment, the customer instigating such tampering or the person causing the damage will be billed the full cost of labor and materials required to reestablish normal service.

3.11 Connection of Automatic Dialing-Announcing Devices

An automatic dialing-announcing device is any automatic equipment used for solicitation which incorporates the following features:

- A. Storage capability of numbers to be called; or a random or sequential number generator that produces numbers to be called.
- B. Has the capability, working alone or in conjunction with other equipment, of disseminating a prerecorded message to the number called.

Automatic dialing-announcing devices used for solicitation purposes where calls initiated by the device cannot be terminated at will by the called party and dial tone restored to the called party promptly upon termination of the call by the called party may not be connected to the telephone network.

Any prerecorded message issued by an automated dialing-announcing device shall be preceded by an announcement which states the name and address of the calling party, the purpose of the message, and that the message is coming from automated equipment.

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GENERAL RULES AND REGULATIONS

Missouri Public
Service Commission

3. General Rules and Regulations (Cont'd)

REC'D SEP 27 2000

3.12 Disputes by Residential Customers

- A. A customer shall advise the Company that all or part of a charge is in dispute by written notice, in person or by a telephone message directed to the Company during regular business hours. A dispute must be registered with the Company prior to the delinquent date of a charge for the customer to avoid discontinuance of service as provided by this tariff.
- B. When a customer advises the Company that all or part of a charge is in dispute, the Company shall record the date, time and place the inquiry is made; investigate the matter promptly and thoroughly; and attempt to resolve the dispute in a manner satisfactory to both parties.
- C. Failure of a customer to cooperate with the Company in efforts to resolve an inquiry which has the effect of placing charges in dispute shall constitute a waiver of the customer's right to continuance of service under this tariff.
- D. If a customer disputes a charge, the customer shall pay an amount to the Company equal to that part of the total bill not in dispute. The parties shall consider the customer's prior usage, the nature of the dispute and any other pertinent factors in determining the amount not in dispute. The Company shall not discontinue service for nonpayment of charges in dispute while the dispute is pending.
- E. If the parties are unable to determine the amount not in dispute, the customer shall pay to the Company, at the Company's option, an amount not to exceed fifty (50) percent of the charge in dispute or an amount based on usage during a like period under similar conditions which shall represent the amount not in dispute. The Company shall not discontinue service to a customer for nonpayment of charges in dispute while that dispute is pending.
- F. Failure of the customer to pay to the Company the amount not in dispute within four (4) working days from the date the dispute is registered or by the delinquent date of the disputed bill, whichever is later, shall constitute a waiver of the customer's right to continuance of service and the Company may then proceed to discontinue service as provided in this tariff.
- G. If the dispute is ultimately resolved in favor of the customer in whole or in part, the Company must promptly repay any excess moneys paid by the customer.
- H. If the dispute cannot be resolved to the satisfaction of the customer, the Company shall notify the customer of its right to make an informal complaint to the Commission, and of the address and telephone number where the customer may file an informal complaint with the Commission.
- I. After resolution of the customer complaint, the Company may treat a second complaint based on the same facts as already determined.

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Original Sheet No. 3-24

GENERAL RULES AND REGULATIONS

Missouri Public
Service Commission

3. General Rules and Regulations (Cont'd)

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GENERAL RULES AND REGULATIONS

3. General Rules and Regulations (Cont'd)

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GENERAL RULES AND REGULATIONS

Missouri Public
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3. General Rules and Regulations (Cont'd)

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LOCAL EXCHANGE SERVICE

4. Local Exchange Service (Cont'd)

4.10 Missouri School Discount Program (Cont'd)

A. General (Cont'd)

- 6. The customer should request to receive the discount on all subsequent additions of eligible services which are ordered. There will be no additional affidavits required.
- 7. The following local exchange services are eligible for a discount under this program:
 - Flat Rate, business one-party service
 - Custom Enhanced Multi-Line Service
 - All other features, ancillary services or options, relative to the particular service, shall continue to be provided at the appropriate tariffed rates.

4.11 Lifeline Service

A. General Regulations

- 1. Lifeline service is available to qualifying low-income subscribers for single-party residence service.
- 2. The monthly discount will be the maximum amount allowed by the Missouri Public Service Commission and the Federal Communications Commission; however, this discount will not exceed the sum of the federal subscriber line charge and the recurring charges for voice telephony service. The monthly discount will be the same for Lifeline customers solely subscribing to voice telephony service and for Lifeline customers subscribing to a bundle of services.
- 3. Lifeline will not be furnished on a Foreign Exchange service.
- 4. Lifeline service shall not be disconnected for non-payment of toll charges.
- 5. Toll blocking provides a means of restricting access to the Long Distance Message Telecommunications Network. Toll blocking for the purposes of lifeline service will restrict 1+, 0+ and 0- (operator handled) calls.
 - a. If the customer chooses "toll blocking" the company will not charge a service deposit.
 - b. Toll blocking is offered to Lifeline subscribers at no charge.

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*Indicates new rate or text
+Indicates change

LOCAL EXCHANGE SERVICE

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4. Local Exchange Service (Cont'd)

4.11 Lifeline Service (Cont'd)

B. Eligibility Requirements

1. An applicant must meet all of the following criteria in order to qualify for Lifeline Service.

a. To qualify for Lifeline the consumer must participate in one of the following programs:

- 1. Mo HealthNet (f/k/a Medicaid)
- 2. Food stamps
- 3. Supplemental Security Income (SSI)
- 4. Federal Public Housing Assistance or Section 8
- 5. Low Income Home Energy Assistance Program
- 6. National School Free Lunch Program
- 7. Temporary Assistance for Needy Families, or
- 8. The customer's income, as defined in 47 CFR §54.400(f), is at or below 135% of the Federal Poverty Guideline (effective June 1, 2012).

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b. The customer must sign, under penalty of perjury a document certifying:

- 1. He/she is receiving benefits from one of the programs in 1.a. above.
- 2. Name of the program(s) from which they are receiving benefits.
- 3. That he/she will notify the company if he/she no longer participates in the program(s) named in a. preceding.

c. The premises at which the residence service is requested must be the applicant's principal place of residence.

d. There is only one telephone line serving the residence premises. The residence premises household (dwelling unit) shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic establishment.

Citizens Telephone Company of Higginsville, Missouri Missouri Application for the Lifeline or Disabled Programs

Consumers meeting certain eligibility criteria are able to receive monthly discounts for voice telephony service through the Lifeline program or the Disabled program. Lifeline service offers a monthly discount of \$15.75. The Disabled program offers a \$6.50 monthly discount. To apply complete this form and also submit **proof of eligibility**.

Eligibility Criteria	
Lifeline Program	Disabled Program
<input type="checkbox"/> MO HealthNet (f/k/a Medicaid) <input type="checkbox"/> Supplemental Nutrition Assistance (Food Stamps) <input type="checkbox"/> Supplemental Security Income <input type="checkbox"/> Low-Income Home Energy Assistance (LIHEAP) <input type="checkbox"/> Federal Public Housing Assistance (Section 8) <input type="checkbox"/> National School Free Lunch Program <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) <input type="checkbox"/> 135% of the Federal Poverty Level <i>(See next page for income threshold requirements)</i>	<input type="checkbox"/> Veteran Administration Disability Benefits <input type="checkbox"/> State Blind Pension <input type="checkbox"/> State Aid to Blind Persons <input type="checkbox"/> State Supplemental Disability Assistance <input type="checkbox"/> Federal Social Security Disability

Applicant's Full Name:	Birth Date:	Social Security # (last 4 digits):	DCN:*
Name on Voice Service Account (If different from Applicant):		Customer Contact Telephone Number:	
Customer's Full Residential Service Address (no P.O. Boxes): Street: City, Town, Zip:		Is this address a temporary address? Yes / No <i>(circle the appropriate response)</i> <i>(If "yes" then must verify address every 90 days.)</i>	
Is this address also my billing address? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If "no" please provide billing address):</i>			

**This number is assigned to program participants of MO HealthNet, LIHEAP, Food Stamps and TANF.*

I understand the following obligations and provisions about the Lifeline and Disabled programs:

- The Lifeline and Disabled programs are government benefit programs and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline or Disabled service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline or Disabled benefits from multiple providers or combine Lifeline and Disabled program benefits.
- Violation of the one-per-household limitation constitutes a violation of rules and will result in the subscriber's de-enrollment from the program.
- Lifeline and the Disabled program are non-transferable benefits and the subscriber may not transfer his or her benefit to any other person.

I CERTIFY UNDER PENALTY OF PERJURY EACH OF THE FOLLOWING:

- I meet the eligibility criteria for the Lifeline program or the Disabled program.
- I will provide notification to my voice service provider within 30 days if for any reasons I no longer satisfy the criteria for receiving Lifeline or Disabled benefits including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline or Disabled support, I receive more than one Lifeline or Disabled benefit, or another member of my household is receiving a Lifeline or Disabled benefit.
- If I move to a new address I will provide that new address to my voice service provider within 30 days.
- If I have a temporary residential address then I will be required to verify my address with my voice service provider every 90 days.
- My household will receive only one Lifeline or Disabled service and, to the best of my knowledge, my household is not already receiving a Lifeline or Disabled service.
- I acknowledge the obligation to re-certify my continued eligibility for Lifeline or Disabled benefits at any time and failure to re-certify my continued eligibility will result in de-enrollment and the termination of Lifeline or Disabled benefits.
- I consent to providing my name, telephone number and address to the Universal Service Administrative Company for the purpose of verifying I do not receive more than one Lifeline benefit. I also consent to sharing my account information with the Federal Communications Commission and Missouri Public Service Commission who oversee and administer the Lifeline or Disabled programs.

_____ I certify I have _____ individuals in my household.
(Initial and complete only if qualifying under income threshold.)

The information supplied on this form is true and correct.

I acknowledge providing false or fraudulent information to receive Lifeline or Disabled benefits is punishable by law.

Signature of Customer

Date

Submit a completed signed form and proof of eligibility.

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)								
1	2	3	4	5	6	7	8	Each add'l person
\$15,890	\$21,506	\$27,122	\$32,738	\$38,354	\$43,970	\$49,586	\$55,202	+ \$5,616/person

Acceptable documentation for meeting the criteria of 135% of the federal poverty level includes: a copy of prior year's state or federal tax return; paycheck stub (three consecutive months); a statement of benefits for Social Security, Veterans Administration, retirement/pension or Unemployment/Workmen's Compensation; or other legal documents showing current income (e.g. divorce decree, child support award). Any documentation must cover a full year or three consecutive months within the previous twelve months.

Company Use Only:

I hereby attest the applicant presented acceptable proof of eligibility:

Print name of company official

Signature

Date

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3010

ATTACHMENT REDACTED IN ENTIRETY